

Remarks

Claims 1-20 are pending in the application and were rejected. By this Amendment, claim 1 has been amended. Reconsideration of the claims is respectfully requested. No new matter has been added.

Rejection Under 35 U.S.C. § 102

Claims 1-4 were rejected under § 102(b) as being anticipated by U.S. Patent No. 5,127,569 issued to Sekine (hereinafter "Sekine '569"). Claim 1 has been amended to recite that "for each work cell at least a portion of the at least one standardized workpiece presenter remains stationary relative to the at least one standardized processing tool when the workpiece is moved within and between each work cell." Sekine '569 does not disclose work cells having standardized workpiece presenters as claimed. Instead, Sekine '569 discloses a work piece carrier 25 (called a workpiece presenter in the Office Action by the Examiner) that moves along "a looped guide way" (A-L) when the workpiece is moved between sub-assembly lines (see column 4, lines 57-60). Consequently, Applicants believe that this rejection has been overcome. Since claims 2-4 depend on claim 1, Applicants believe that the rejection of these claims is overcome for the same reasons.

Applicants note that the specification as originally filed contains sufficient support for the amendment to claim 1. For example, each work cell is shown mounted on a support surface such that at least a portion of the standardized workpiece presenter remains stationary at all times and therefore is stationary when a workpiece is moved within and between each work cell. Thus, the present invention is sufficiently disclosed to satisfy both the written description and enablement requirements.

Rejection Under 35 U.S.C. § 103

Claim 5 was rejected under § 103(a) as being unpatentable over Sekine '569 in view of U.S. Patent No. 6,467,675 issued to Ozaku (hereinafter "Ozaku '675"). Claim 5

depends on claim 1. Consequently, Applicants believe that this rejection is overcome for the reasons previously discussed.

Claim 6 was rejected under § 103(a) as being unpatentable over Sekine '569 in view of Ozaku '675 and further in view of U.S. Patent No. 5,014,901 issued to Moran (hereinafter "Moran '901") and still further in view of U.S. Patent No. 3,763,344 issued to Okabe (hereinafter "Okabe '344"). Claim 6 depends on claim 5. Consequently, Applicants believe that this rejection is overcome for the reasons previously discussed.

Claim 7 was rejected under § 103(a) as being unpatentable over Sekine '569 in view of Ozaku '675 and further in view of Moran '901 and still further in view of Okabe '344 and still further in view of U.S. Patent No. 6,642,473 issued to Stiers (hereinafter "Stiers '473"). Claim 7 depends on claim 6. Consequently, Applicants believe that this rejection is overcome for the reasons previously discussed.

Claims 8-11 was rejected under § 103(a) as being unpatentable over Sekine '569. Claims 8-11 depend on claim 1. Consequently, Applicants believe that this rejection is overcome for the reasons previously discussed. Moreover, Sekine '569 does not disclose or suggest a method of designing a process line for a "closure that is a vehicle passenger compartment door." Applicants further traverse the Examiner's attempt to take official notice that the use of a manufacturing line for the production of a body panel somehow renders obvious the use of that line for the production of dissimilar subassemblies such as closures that have different structures, functions, and more complex configurations. Thus, Applicants respectfully request that this rejection be withdrawn.

Claims 12-15 were rejected under § 103(a) as being unpatentable over Sekine '569 in view of Ozaku '675 and further in view of Moran '901 and still further in view of Okabe '344. Applicants respectfully believe that a *prima facie* case has not been established. Sekine '569, Ozaku '675, and Moran '901, either alone or in any combination, do not disclose the combination of method steps disclosed in claim 12. For instance, none of the cited

references discloses or suggests a vehicle closure, let alone a manufacturing process line for making a vehicle closure as recited in claim 12. Moreover, the predetermined sequence of work cells disclosed in claim 12 is not a mere rearrangement of parts as argued by the Examiner. Claim 12 recites a method for designing a manufacturing line for a vehicle closure. In contrast, the case cited by the Examiner (*In re Japikse*) is limited to the position of a starting switch in a hydraulic power press. Since Applicants are claiming a method and not an apparatus, *In re Japikse* is simply not relevant or applicable to the claimed invention. Moreover, none of the cited references, either alone or in any combination, discloses or suggests this specific method step. As such, Applicants respectfully believe that a *prima facie* case has not been established and respectfully request that this rejection be withdrawn. Claims 13-15 depend on claim 12. Consequently, these claims are believed to be allowable for the reasons previously discussed.


Claims 16-18 and 20 were rejected under § 103(a) as being unpatentable over Sekine '569 in view of Ozaku '675 and further in view of Moran '901 and still further in view of Okabe '344 and still further in view of Stiers '473. Claim 16 depends on claim 12 and is therefore believed to be allowable for the reasons previously discussed. Claims 18 and 20 depend on claim 16 and are therefore believed to be allowable for the reasons previously discussed.

Claim 19 was rejected under § 103(a) as being unpatentable over Sekine '569 in view of Ozaku '675 and further in view of Moran '901 and still further in view of Okabe '344 and still further in view of Stiers '473 and still further in view of U.S. Patent No. 6,001,181 issued to Bullen (hereinafter "Bullen '181"). Claim 19 depends on claim 18 and is therefore believed to be allowable for the reasons previously discussed.

Conclusion

Applicants have made a genuine effort to respond to the Examiner's objections and rejections in advancing the prosecution of this case. Applicants believe all formal and substantive requirements for patentability have been met and that this case is in condition for allowance, which action is respectfully requested.

Respectfully submitted,
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